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No. 84 - 1044

Supreme Court, U.S.  
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IN THE  
**Supreme Court of the United States**

OCTOBER TERM, 1984

PACIFIC GAS AND ELECTRIC COMPANY,

*Appellant,*

v.

PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA, et al.,

*Appellees.*

On Appeal From The Supreme Court Of California

BRIEF OF THE STATE OF ILLINOIS  
AND THE ILLINOIS CITIZENS UTILITY BOARD,  
AS AMICI CURIAE URGING AFFIRMANCE

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The State of Illinois submits this brief in support of appellees in accordance with Rule 36.4 of the Rules of this Court. The Illinois Citizens Utility Board has received the written consent of all parties to its participation and has filed its letters of consent with the Clerk of this Court.

## INTERESTS OF AMICI

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The State of Illinois, as representative of the People of Illinois, has a strong public policy interest in the outcome of this case. Illinois seeks to assure that the States have the opportunity to explore and experiment with methods that assure that utility rate-making bodies can gather sufficient information at rate hearings to enable them to set just and reasonable rates. The Illinois General Assembly has determined that one effective method for assuring a complete presentation of facts to the Illinois Commerce Commission is through active participation of the Illinois Citizens Utility Board (Illinois CUB) in educating the citizens of Illinois and in representing their interest in rate hearings. In light of these legislative determinations, the Illinois General Assembly established Illinois CUB by statute enacted in 1983.

Illinois CUB is a nonprofit public body corporate and politic made up of residential utility consumers who voluntarily submit membership applications and contribute dues. Illinois CUB sustains itself through these dues alone. Membership is solicited, pursuant to statute, through envelope enclosures or by means of postcard statements mailed by public utilities along with their regular billings.

The Illinois statutory scheme has been a definite success. In operation for one year, this scheme has not created any substantial difficulties for utilities or impeded their own communications with customers. Moreover, CUB has contributed in a significant way to make rate hearings and other legislative activities more balanced and to promote the setting of fair and reasonable utility rates in Illinois.

We support the position of the Appellees in this matter and believe that information about the operation of the Illinois legislative scheme will assist this Court in evaluating the assertions made by Pacific Gas and Electric Company. In addition, we support and adopt the arguments presented in the Brief of New York Citizens' Utility Board, Inc. and Utility Consumers' Action Network as Amici Curiae Urging Affirmance.

## SUMMARY OF ARGUMENT

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The Illinois Citizens Utility Board was created by the state legislature, in the exercise of its police power, to educate consumers on utility issues and to enhance the rate-making process by providing utility regulators with residential ratepayers' viewpoints concerning just and reasonable rates. Illinois CUB has now operated successfully for a full year, without causing confusion to utility consumers or impeding the speech of the utilities who have included CUB's mailings with their regular billing. Both CUB messages and utility messages have been enclosed in the same billing envelopes.



## ARGUMENT

### THE MAILING PROCEDURE UTILIZED BY THE ILLINOIS CITIZENS UTILITY BOARD HAS NOT IMPAIRED UTILITY SPEECH IN ANY WAY

In 1983, the Illinois General Assembly recognized a fundamental imbalance in the participation in public utility regulation, especially presentations to the Illinois Commerce Commission (ICC) in rate hearings. The ICC has a statutory obligation to fairly balance the interests of utility shareholders in a reasonable return on their investment and the rights of the consumers to affordable rates and reliable service. Illinois Public Utilities Act, Ill. Rev. Stat., ch. 111½, ¶¶ 32, 36 (1984 Cum. Supp.); *Village of Monsanto v. Touchette*, 63 Ill. App. 2d 390, 211 N.E.2d 471 (5th Dist. 1965).

Illinois utilities have historically been able to devote substantial financial resources to marshal evidence, experts, and detailed arguments before the ICC.<sup>1</sup> Conversely, residential ratepayers had not marshalled their resources, and had scant opportunity to disseminate information and secure adequate representation. As a result, Illinois citizens raised significant questions concerning the fairness of rate decisions. Utility rate hikes became a matter of substantial public concern.

Due to the public perception that rate-making decisions were skewed in favor of utilities, democratic pressures

<sup>1</sup> For example, Commonwealth Edison reports that in 1984 it spent \$1,438,168 for expenses in connection with ICC litigation. Commonwealth Edison Annual Report to the Illinois Commerce Commission, Dec. 31, 1984, p. 350. These costs are treated as operating expenses and recovered through rates.

were asserted to correct that imbalance. The Citizens Utility Board Act was passed in direct response to this strongly felt need, to ensure "effective and democratic representation of utility consumers before the Illinois Commerce Commission . . . and other public bodies" and to provide "consumer education on utility service prices and on benefits and methods of energy conservation." Ill. Rev. Stat. ch. 111½, ¶ 902 (1984 Cum. Supp.).

In its brief history, CUB has generated significant public support. From its first mailing in July 1984, CUB has acquired new members from all regions of the State at the rate of 25,000 each quarter. Its membership reached 110,000 participants by June 1985.

To date, CUB has intervened in four major ICC proceedings in order to provide the decision-makers with the residential ratepayers' viewpoints concerning just and reasonable utility rates. In response to the imminent expiration of the Illinois Public Utilities Act, which governs utility rates and services, CUB has also played a major role in the legislature's recent action to comprehensively revise Illinois public utility regulation.

Finally, through its newsletters and regular distribution of consumer fact sheets to its membership, CUB has helped to educate citizens on utility issues and, in particular, on ratepayers' rights. Thus even at this initial stage CUB is undeniably fulfilling the stated legislative intention to enhance consumer education on utility issues and to ensure that the ICC and other decision-makers are presented with a broader range of evidence for consideration in rate hearings.

Since July 1984, CUB has caused 16 million enclosures, and 6 million postcard messages, to be included in utility bills without any substantial problems or disputes with

Illinois utilities. The CUB enclosures do not resemble billings; they clearly disclaim any association with the utility company.<sup>2</sup> A sample CUB enclosure is contained at pages A. 5-6 in the Appendix to this brief. Moreover, in many cases, the utilities' bills or enclosures have explicitly disclaimed any responsibility for the CUB enclosures.

Illinois utilities have in no way been restricted in their efforts to communicate with their customers. Indeed, the enormous quantity of material often contained in a utility billing envelope belies many of the "horribles" suggested by those opposing the use of bill inserts by organizations such as Illinois CUB. For example, Peoples Gas Light & Coke Company's ("Peoples Gas") May 24, 1985 billing envelope included:

- 1) A one-page bill (not in the Appendix to this brief);
- 2) Peoples Gas' "Bulletin", a two-page newsletter printed on both sides of each page explaining the utility's views on rates and other matters (A. 1-4);
- 3) Illinois CUB's membership solicitation (one page, printed on both sides) (A. 5-6);
- 4) Three empty envelopes to return payment for future Peoples Gas bills (A. 7-9); and
- 5) The billing envelope itself, which has printed (on the reverse side) pictures and a message soliciting information about missing children (A. 10-11).

Included within the Peoples Gas publication, the Bulletin, are statutorily required notices. (See A. 3). As the billing envelope demonstrates, all of this material was sent for the pre-sorted postal rate of 17 cents per envelope (A. 10).

<sup>2</sup> The CUB statute provides that CUB's enclosures may not resemble billings. ¶ 909(3).

This mailing illustrates that the assertion by Pacific Gas and Electric Company ("PGE") and the other utilities that utility speech will have to be curtailed to accommodate TURN's mailings is groundless. Utility speech is, if anything, in overwhelming supply and readily co-exists with enclosures from consumer organizations, such as Illinois CUB. PGE is not seeking free speech; it is seeking subsidized speech to the exclusion of others.

Nothing in the California PUC ruling, and nothing in the Illinois statute, impedes utility speech to customers. Both states have merely required another form of notice. Public notices have long been required by many state and federal laws and have long been accepted by the utilities. For example, under federal law, electric utilities must disseminate rate schedules and proposed rate changes. These notices are frequently mailed with the utility bills. 16 U.S.C. § 2625(f). Illinois regulations require notices of charges, discontinuance of service notices, second language notices and, in the case of phone companies, specified directories. 83 Ill. Adm. Code §§ 280.130, 280.190, 735.70, 735.180, 735.220. A State-endorsed notice that consumers may participate in rate hearings through CUB or TURN is no more onerous and is directed to precisely the same goal—a well informed public. The States properly exercise their police power when they seek to assure that the public may participate in rate-making decisions through democratic efforts.

## CONCLUSION

---

The order appealed should be affirmed.

Respectfully submitted,

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July 19, 1985

# **APPENDIX**



## CUSTOMERS INFORMATION

**Bulletin***Peoples Gas*

SPRING 1985

*Good News:***GAS COSTS ARE LEVELING OFF**

We are pleased to report that the cost of natural gas finally is leveling off after a long period of rapidly escalating prices. Fact is, if the last two winters hadn't been colder than normal, it's likely that you already would have noticed that prices have stabilized.

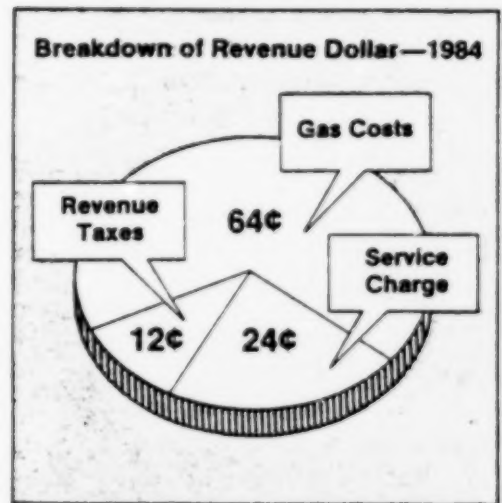
If weather were normal, the annual gas bill for an average Chicago dwelling at our current rates (May, 1985) would be only about 3.5 per cent higher than the bill for calendar 1983. Inflation, meanwhile, has totaled about 6 per cent since the end of 1983.

Our most recent survey of 30 major metropolitan cities shows that residential gas-heating costs in Chicago (before revenue taxes) rank far down the list in the 22nd spot, with Peoples Gas customers paying substantially less than their counterparts in major Eastern cities.

**More good news:** We do not plan to request a general rate increase from the Illinois Commerce Commission at least through the balance of this year, so rates covering our own operating costs will remain stable throughout all of 1986.

All of this news should provide welcome relief for consumers because the cost of gas we buy for delivery to you had been rising rapidly, due to regulations and policies set by the federal government in Washington. And these

costs represent about 64 per cent of our total revenues. (See Chart.)



Another portion — 12 per cent — results from revenue taxes levied by the State of Illinois and the City of Chicago. The remaining portion of our revenues represents the "Service Charge" approved by the Illinois Commerce Commission in rate cases. Included in this Charge are such things as payroll costs, uncollectable accounts, property and income taxes, depreciation, interest expenses, and a profit of about four cents out of each dollar on your bill.

When we do file for a rate increase, proceedings before the Commission are handled by two or three members of our own legal staff. We do not hire outside attorneys for such cases. Most evidence supporting our request is provided by company personnel,

(Continued, next page)

### Good News (Continued)

with some testimony given by outside experts.

Typically in our rate cases, the Commission's staff has legal counsel and other attorneys are present to represent numerous intervenors from the public and private sectors, including community groups, industrial organizations, and state, county, and city governments.

We've been working hard to bring about some meaningful reductions in the cost of gas

purchased for delivery to you, while keeping our own costs under control. For instance, we've been actively trying to improve federal gas laws and regulations, encouraging more competition among pipeline suppliers, and buying some gas directly from a producer. These efforts are starting to pay off and we are seeing notable improvements at last.

We join with our customers in welcoming this relief. Hopefully, gas prices will remain fairly stable and those large increases will be a thing of the past.

#### Need money to weatherize your property?

#### A Chicago Energy Savers Fund low-cost loan might help!

Find out if you're eligible—Owners of 1- to 4-flat buildings, call:

**Neighborhood Housing Service (NHS) 454-0756**

Owners or managers of 5- to 49-Flat or low-rise buildings, call:

**Community Investment Corporation (CIC) 341-0070**

Both phones in service Mon.-Fri., 9:00 A.M.—5:00 P.M.

Building Size	Interest Rates	Loan Limits
Single Family Home	6-8%	\$500 to \$3,000
2- Flat Building	6-8%	\$500 to \$6,000
3- or 4-Flat Building	6-8%	\$500 to \$8,000
5- to 49-Flat Low-rise	8%	\$3,000 maximum per unit, up to \$98,000 per building. Minimum loan of \$5,000

NOTE: Program terms and conditions subject to change without notice.

Customers who receive an energy conservation loan for heating equipment under the Chicago Energy Savers Fund will not be eligible to participate in the Peoples Gas Incentive Program.

### New downtown site for our Customer Service Area

One condition of the recent sale of the 122 South Michigan Avenue Building (formerly Peoples Gas Building) was that the gas company vacate its lobby offices. To maintain a convenient downtown business office for our customers, the company has rented space at the southeast corner of State and Van Buren (the former Sears store).

Convenient to public transportation, this office will provide full service. Our customers will be able

to pay gas bills, apply for service and discuss gas business matters with the Account Representatives on our staff.

An added feature will be our new "Gas Energy Conservation and Education Center." Here, interesting exhibits will display information about the gas industry plus valuable tips on how consumers can save on their use of gas energy.

This new office is scheduled to open on or about May 13th.

## Budget Payment Plan accounts now earn 9.5% interest

On Sept. 5, 1984 a feature was added to our Budget Payment Plan that provides customers another excellent benefit. Under this new feature, the company pays interest on the daily credit balances of these accounts. The annual rate of interest paid has been established by the Illinois Commerce Commission and is the same rate the company pays on customers' deposits. The present rate is 9.5%.

Other good reasons customers join the Plan include: avoiding high gas payments during the heating season, knowing in advance how much their monthly bills will be, and being able to logically plan their household energy expenses.

The Budget Plan is designed to

level off a customer's gas bills by spreading them out over the entire year into equal monthly payments. We first estimate the total cost of a customer's gas usage for the coming year, assuming normal weather. That total is then divided by 12 to establish the equal monthly billing amounts.

Budget accounts are reviewed in January or February and adjusted, when necessary, to reflect any changes in gas consumption or in the price of natural gas.

The Budget Plan year for your billing district begins next month. To join the Budget Payment Plan or for more information, call an Account Representative at 431-7004.

## Add-A-Dollar help still needed

In the wake of last winter's frigid weather, some of our needy customers have fallen behind in their gas bill payments.

The gas company maintains Add-A-Dollar, a matching gift fund, to provide financial assistance for those customers. We will match contributions up to a total of \$250,000.

The Salvation Army picks the customers to be granted up to \$200.

Through March, we have matched \$79,041 in contributions.

We urge all, who can, to add one dollar to their monthly gas bill payments. These gifts are tax-deductible.

Larger gifts may be sent to: Add-A-Dollar/Salvation Army, P.O. BOX 8634, Chicago, IL 60680-8634.

If your employer contributes to worthy causes, why not suggest Add-A-Dollar.

## NOTICE

In accordance with the requirements of Federal Law and the Federal Department of Energy, we are required to inform each residential customer using gas for outdoor lighting of the amount of gas consumed in the outdoor gas light.

An outdoor gas light typically consumes 180 therms of gas per year. Based upon our rates in effect on April 1, 1985, 180 therms of gas will cost \$87 per year, exclusive of Additional Charges for State and Municipal Utility Taxes.

## High efficiency incentive credits prove very popular

*Many earn credits of \$100 or \$150*

Nearly 700 applications for incentive credits have been approved for customers who have installed high efficiency gas central space heating equipment. This has been the response to a special high efficiency incentive program offered by the gas company since Oct. 15, 1984.

The program is designed to encourage customers to conserve on gas by using this new energy-efficient equipment. Following is a description of the program.

The seasonal efficiency of an average old gas furnace is only about 67%. To combat that problem, America's gas furnace and boiler manufacturers are making units with higher efficiencies than ever before. Some are as high as 96% efficient.

Now the law requires that all new furnaces and boilers be rated on the basis of test procedures established by the U.S. Government. These Annual Fuel Utilization Efficiency (AFUE) ratings make it easy for shoppers to determine which units will

bring the best results for the fewest energy dollars.

The gas company offers incentives on gas units with AFUE ratings of 82% or higher. For those eligible, the company is offering credits on their gas bills for having such equipment installed on their properties in our service territory. A credit of \$100 is allowed for equipment with ratings from 82 to 89%; a credit of \$150 is allowed for units rated over 89%.

While this equipment is more expensive than conventional models, the incentive credit and annual savings on gas, ranging from 16 to 30%, assure the buyer a relatively short payback period.

So, before shopping for a new heating plant, call one of our Gas Utilization Representatives to learn more about our incentive program and to find out if you are eligible. Don't wait too long, however, because the company has reserved the right to withdraw the program at any time. North siders, call 794-6903; the number for South siders is 962-4922.

## Before you dig—Call "DIGGER" (312) 744-7000

If you're planning any excavation work (other than simple surface digging), be sure to call "DIGGER" first. Gas lines or other underground utility facilities may be located in or near your work site.

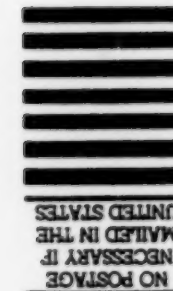
To avoid a digging accident, call "DIGGER" at (312) 744-7000 to reach the Chicago Utility Alert

Network. If we or any other network member have facilities in the area, personnel will be dispatched to mark their location for you.

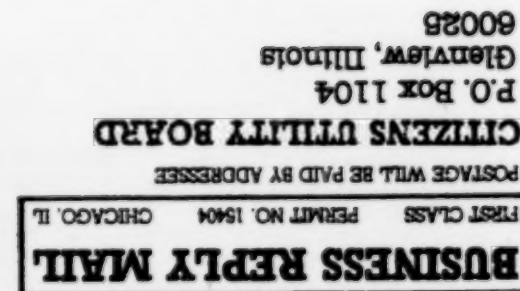
The "DIGGER" line is in operation at all times, but it is best to give an advance notice of 48 hours or more. There is no charge for this service.

## Finally...there's a way to fight back.

*(this is not a message from the utility company)*



NO POSTAGE  
NECESSARY IF  
MAILED IN THE  
UNITED STATES



Your stamp helps us save money

Are you  
**FED UP**  
with skyrocketing utility bills?  
Are you tired of hearing excuses?



MONITOR AND FOLD LAST

## Important Message from your Citizens Utility Board

**DEAR FRIEND:**

When your gas, electric, or telephone company wants to raise its rates, it rushes to the Illinois Commerce Commission with an army of high-priced lawyers and expensive consultants—the best money can buy. They can afford the best...because you pay for them.

That's one reason utility companies often get the rate increases they want!

Look at what's happened to gas bills. The average Illinois household with gas heat used 20% LESS gas in 1983 compared to 1979. However, rate increases made the average annual bill jump from \$693 to \$836. That's a whopping 41% hike in a mere four years.

Sometimes it makes you feel powerless.

But you can fight back. When you join the Citizens Utility Board you get a voice in rate increase hearings. With your help, we will battle unnecessary rate increases before the ICC, in Springfield, and all the way to Washington.

The Citizens Utility Board is a new organization of 75,000 of your Illinois neighbors who've joined together to oppose high rates and unfair utility policies that cost us all money.

We're not a government agency and we receive no tax dollars. Our members are utility customers just like you. We work together to provide a strong voice for consumers before the Illinois Commerce Commission and other government agencies.

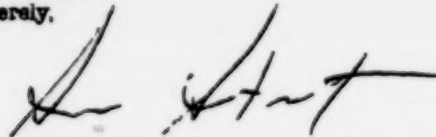
CUB's team of experts has only one mission—to fight for lower rates and better service.

Join CUB now. As a member, you will receive the latest information about the proposed rate increases. And you will be able to attend meetings of CUB members in your area and voice your concerns.

Most important, you will help to control runaway utility costs. You will be part of a powerful and growing organization that works overtime to keep utilities from taking more and more of your money.

Help make CUB work for you. Send your check or money order in this convenient mailer TODAY!

Sincerely,



Susan K. Stewart  
CUB Administrative Director

**YES!** I want to fight back with CUB. Sign me up as a full voting member (minimum contribution \$5 per member).

NAME (#1) \_\_\_\_\_ ENCLOSED IS: ☐ \$25

NAME (#2) \_\_\_\_\_ ☐ \$15

NAME (#3) \_\_\_\_\_ ☐ \$10

ADDRESS \_\_\_\_\_ \$Other \_\_\_\_\_

CITY, STATE, ZIP \_\_\_\_\_

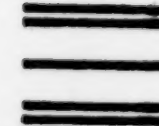
PHONE( ) \_\_\_\_\_

SEND YOUR CHECK OR  
MONEY ORDER DIRECTLY TO  
CUB—NOT TO YOUR UTILITY  
COMPANY.

Not paid for with tax dollars. Not paid for by any utility company.  
Written and paid for by Cub, 59 East Van Buren, Suite 801, Chicago, IL 60605

FOLD FIRST

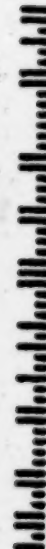
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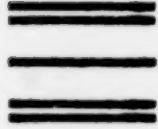
THE PEOPLES GAS LIGHT  
AND COKE COMPANY  
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CHICAGO, ILLINOIS 60687-0001



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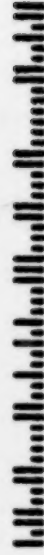
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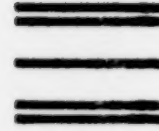
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THE PEOPLES GAS LIGHT  
AND COKE COMPANY  
BILL PROCESSING CENTER  
CHICAGO, ILLINOIS 60687-0001





**Peoples Gas**

The Peoples Gas Light  
and Coke Company  
122 South Michigan Avenue  
Chicago, Illinois 60603

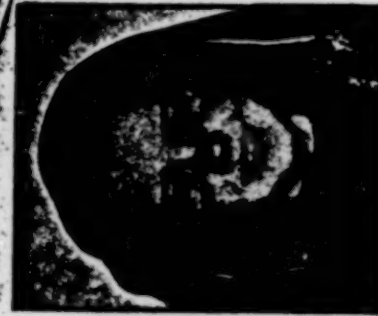


FIRST CLASS  
007000000

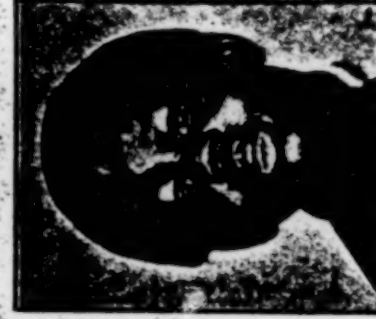


**ENERGY!**  
USE IT WISELY

**HAVE YOU SEEN  
THESE MISSING CHILDREN?**

**ANN GOTLIB**

Female, white; 14 years' old  
Height-5 ft.-1 in., weight-85 lbs.  
Grey eyes, curly auburn hair  
Abducted from Louisville, KY-  
June 1983

**MITCHELL D. OWENS**

Male, black; 6 years' old  
Height-3 ft., weight-40 lbs.  
Brown eyes, black hair  
Abducted from Menlo Park, CA-  
February 1983

If you can identify these children or other missing children, call the  
National Center for Missing and Exploited Children at this toll-free number:

**1-800-843-5678**